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DAREN GLOSSER

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11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**
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14 UNITED STATES OF AMERICA,
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16 Plaintiff,
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18 vs.
19 DAREN GLOSSER, et al.,
20
21 Defendants.

CR. S-05-309 GEB

**STIPULATION AND [PROPOSED]
ORDER CONTINUING STATUS
CONFERENCE AND EXCLUDING
TIME UNDER THE SPEEDY TRIAL
ACT**

21 IT IS HEREBY STIPULATED between the United States of America, through its attorney
22 of record, Samuel Wong, Assistant U.S. Attorney; Daren Glosser, through his attorneys, David
23 W. Dratman and Ean Vizzi; and Shannon Selle, through her attorney, Randolph E. Daar, that the
24 status conference scheduled for March 17, 2006, shall be continued to March 31, 2006 at 9:00 a.m.

25 This case involves the service of at least nine separate search warrants in two federal
26 judicial districts. The parties stipulate and agree that this matter continues to be complex within the
27 meaning of the Speedy Trial Act due to the volume of discovery (over 3,200 pages, at least 8 CDs
28 of photographs, 3 videotapes, hundreds of seized exhibits), complexity of factual and legal issues,

1 and the need for defense counsel to have additional time to conduct the defense investigation and
2 prepare.

3 The parties stipulate and agree that time, from March 17, 2006 through and including March
4 31, 2006, shall be excluded from computation of time within which the trial of this case must be
5 commenced under the Speedy Trial Act, pursuant to Local Codes T2 (case unusual and complex)
6 and T4 (time for defense counsel to prepare).

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8 Dated: March 16, 2006

/s/ David W. Dratman
DAVID W. DRATMAN
EAN VIZZI
Attorney for Defendant
DAREN GLOSSER

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12 Dated: March 16, 2006

/s/ Randolph E. Daar*
RANDOLPH E. DAAR
Attorney for Defendant
SHANNON SELLE
*Signed with permission

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16 Dated: March 16, 2006

McGREGOR W. SCOTT
UNITED STATES ATTORNEY

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18 By: /s/ Samuel Wong*
SAMUEL WONG
Assistant U.S. Attorney
*Signed with permission
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21 **ORDER**

22 The Court having received, read, and considered the stipulation of the parties, and good cause
23 appearing therefrom,

24 The Court adopts the stipulation of the parties in its entirety as its order. Based on the
25 stipulation of the parties, the Court finds that this case is unusual and complex within the meaning
26 of Local Code T2. The Court further finds that the failure to grant a continuance in this case would
27 deny defense counsel reasonable time necessary for effective preparation, taking into account the
28 exercise of due diligence. The Court specifically finds that the ends of justice served by the granting

STIPULATION AND [PROPOSED] ORDER CONTINUING STATUS CONFERENCE

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1 of such continuance outweigh the interests of the public and that the time from March 17, 2006 to
2 and including March 31, 2006, shall be excluded from computation of time within which the trial
3 of this case must be commenced under the Speedy Trial Act, pursuant to Local Codes T2 (case
4 unusual and complex) and T4 (time for defense counsel to prepare).

5 It is so ordered.

6 Dated: March 21, 2006

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8 /s/ Garland E. Burrell, Jr.
9 GARLAND E. BURRELL, JR.
United States District Judge